4. Reject Interval
5. FOC Timeliness
6. Acknowledgment Message Timeliness-EDI
7. Acknowledgment Message Timeliness-TAG
8. Acknowledgment Message Completeness-EDI
9. Acknowledgment Message Completeness-TAG

ALEC witness Bursh testified that the BellSouth SEEM remedy plan omits measures that are critical to assuring nondiscrimination. Any remedy plan must cover all forms of operational support required by the Act. Both blatant (directly and immediately customer observable) and subtle discrimination (ALEC operational support) will ultimately impact customers. Due to the many omitted measures, BellSouth's SEEM remedy plan does hinder sanctions for noncompliance.

DECISION

Attachment 6, which is incorporated herein, shows the metrics that BellSouth proposes to include in the enforcement plan and the metrics that we find shall be included. The ALECs' position is that all metrics and all levels of disaggregation should be included. We do not agree with the ALECs' position because the FCC has previously indicated that enforcement plans do not need to include all measures. We agree with BellSouth in that there are several factors, such as parity by design, correlation and the regional nature of measures, that make a smaller set of metrics appropriate.

We have made special note of the specific metrics that are identified in witness Bursh's testimony as being inappropriately omitted from Tier 1. We agree that Invoice Accuracy and Mean Time to Deliver Invoices shall be included as Tier 1 metrics. We also agree that Reject Interval and FOC Timeliness and the corresponding LNP metrics shall be included as Tier 1 metrics. We also find that the Acknowledgment Message Timeliness and Acknowledgment Message Completeness metrics shall be included as Tier 1 metrics. Additionally, Out of Service > 24 Hours has been included as both a Tier 1 and a Tier 2 metric.

We find that the enforcement metrics established herein, represent a comprehensive set of metrics that will adequately evaluate the most critical areas of carrier-to-carrier

performance. We are establishing 24 Tier 1 metrics and 34 Tier 2 metrics compared to the BellSouth proposed 15 and 31 respectively.

Of the 24 Tier 1 metrics approved herein, seven cover the ordering domain, eight cover the provisioning domain, five are from the Maintenance and Repair domain, and two are from the billing domain. These domains are the most critical aspect of OSS performance. Other Tier 1 metrics include Trunk Group Performance and Collocation.

The 34 Tier 2 metrics are comprised of five preordering metrics and eight ordering metrics. Additionally, there are nine Tier 2 provisioning metrics, five maintenance and repair metrics, and three billing metrics. In addition to these major domains, there are Tier 2 metrics covering Trunk Group Performance, Collocation and Change Management.

We find that there are many factors which must be considered when determining whether a metric should be included as an enforcement mechanism. In order to make this determination, we looked at whether the metric is customer-impacting or if the metric is critical to ALECs in providing quality service in a timely manner. Other factors include whether the measure was diagnostic, correlated, parity by design, and quality of the metric. To evaluate whether a metric should specifically be included in Tier 1 or Tier 2, we considered regional versus individual ALEC reporting capability.

We find that the metrics displayed in the "Commission Approved" column in Attachment 6 shall be included in the Florida Performance Assessment Plan as Tier 1 and Tier 2 enforcement metrics.

ATTACHMENT 6

BellSouth Proposed Enforcement Mechanisms					
		BellSouth Proposed Enforcement Measures		Commission Approved Enforcement Measures	
No.	Measure	Tier 1	Tier 2	Tier 1	Tier 2
	Preordering				
OSS-1	Average Response Time for OSS Pre-Order Interfaces & Response Interval		x		x
OSS-2	OSS Interface Availability (All Systems)		x		x
OSS-3	Interface Availability (M&R)		x		x
OSS-4	Response Interval (M&R)				x
PO-1	Loop Makeup Inquiry (Manual)		x		x
PO-2	Loop Makeup Inquiry (Electronic: TAG and LENS)		x		x
	Ordering				
O-1	Acknowledgment Timeliness (Electronic)		x	x	x
O-2	Acknowledgment Completeness (Fully Mechanized, Partially Mechanized & Total Mechanized)		x	x	x
O-3/4	Percent Order Flow Through (Summary & Detail)		x		x
O-5	Flow-through Error Analysis				
O-6	CLEC LSR Information - LSR Flow-Through Matrix				
O-7	Percent Rejected Service Request (Fully Mechanized, Partially Mechanized & Non-Mechanized)				
O-8	Reject Interval		x	x	x
O-9	Firm Order Confirmation Timeliness (Fully Mechanized, Partially Mechanized & Non-Mechanized)		x	x	x

BellSouth Proposed Enforcement Mechanisms					
		BellSouth Proposed Enforcement Measures		Commission Approved Enforcement Measures	
No.	Measure	Tier 1	Tier 2	Tier 1	Tier 2
O-10	Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time (Manual)				
O-11	Firm Order Confirmation and Reject Response Completeness	x	x	x	x
O-12	Speed of Answer in Ordering Center				x
O-13	LNP - Percent Rejected Service Request				
O-14	LNP - Reject Interval Distribution & Average Reject Interval			x	x
O-15	LNP - FOC Timeliness Interval Distribution & FOC Average Interval			x	x
	Percent Order Accuracy				
Provisioning					
P-1	Mean Held Order Interval				
P-2	Average Jeopardy Notice Interval (Electronic)				
P-2	Percent Orders given Jeopardy Notice (Electronic)				
P-3	Percent Missed Installation Appointments	x	x	x	x
P-4	Order Completion Interval	x	x	x	x
P-5	Average Completion Notice Interval (Electronic)				
P-6	Coordinated Customer Conversions Interval	x	x	x	x
P-6A	Coordinated Customer Conversions Hot Cut Timeliness % within Interval & Average Interval	x	x	x	x
P-6B	Coordinated Customer Conversions - Average Recovery Time				

BellSouth Proposed Enforcement Mechanisms					
		BellSouth Proposed Enforcement Measures		Commission Approved Enforcement Measures	
No.	Measure	Tier 1	Tier 2	Tier 1	Tier 2
P-6C	Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 Days of a Completed Service Order	x	x	x	x
P-7	% Successful xDSL loops cooperatively tested		x	x	x
P-8	% Provisioning Troubles within 30 days	x	x	x	x
P-9	Total Service Order Cycle Time				
P-10	LNP - Percent Missed Installation Appointments	x	x	x	x
P-11	LNP - Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution	x	x		
P-12	LNP - TSOCT				
	% Completions/Attempts w/o notice or w/Less Than 24 Hr Notice				
	% Completion of Timely Loop Modification				
Maintenance & Repair					
M&R-1	Missed Repair Appointments	x	x	x	x
M&R-2	Customer Trouble Report Rate	x	x	x	x
M&R-3	Maintenance Average Duration	x	x	x	x
M&r-4	% Repeat Troubles within 30 days	x	x	x	x
M&R-5	Out of Service > 24 hours			x	x
M&R-6	Average Answer Time - Repair Center				
M&R-7	Mean Time to Notify CLEC of Network Outages (M&R)				
Billing					
B-1	Invoice Accuracy		x	x	x

BellSouth Proposed Enforcement Mechanisms					
		BellSouth Proposed Enforcement Measures		Commission Approved Enforcement Measures	
No.	Measure	Tier 1	Tier 2	Tier 1	Tier 2
B-2	Mean Time to Deliver Invoices		x	x	x
B-3	Usage Data Delivery Accuracy		x		x
B-4	Usage Data Delivery Completeness				
B-5	Usage Data Delivery Timeliness				
B-6	Mean Time to Deliver Usage				
B-7	Recurring Charge Completeness				
B-8	Non-Recurring Charge Completeness				
	% Billing Errors Corrected in X Days				
OS/DA					
OS-1	Average Speed to Answer (OS)				
OS-2	% Answered in "X" Seconds (OS)				
DA-1	Average Speed to Answer (DA)				
DA-2	% Answered in "X" Seconds (DA)				
Database Update Information					
D-1	Average Update Interval for DA Database for Facility Based CLECs				
D-2	Percentage DA Database Accuracy For Manual Updates				
D-3	Percent NXXs loaded and Tested by/or prior to the LERG effective date				
E911					
E-1	Timeliness				
E-2	Accuracy				
E-3	Mean Interval				
Trunk Group Performance					
TGP-1	Trunk Group Performance - Aggregate		x		x

BellSouth Proposed Enforcement Mechanisms					
		BellSouth Proposed Enforcement Measures		Commission Approved Enforcement Measures	
No.	Measure	Tier 1	Tier 2	Tier 1	Tier 2
TGP-2	Trunk Group Performance - Specific	x		x	
	Collocation				
C-1	Average Response Time				
C-2	Average Arrangement Time				
C-3	% of Due Dates Missed	x	x	x	x
	Bona Fide/Special Request Process (BFRs)				
	Percentage of Requests Processed within 30 Business Days				
	Percentage of Quotes Provided for Authorized BFRs/Special Requests Within X (10,30,90) Days				
	Change Management/Interface Outages				
CM-1	Timeliness of Change Management Notices		x		x
CM-2	Average Delay Days for Change Management Notices				
CM-3	Timeliness of Documents Associated with Change		x		x
CM-4	Average Delay Days for Documentation				
CM-5	Average Notice of Interface Outage				
	TOTAL	**15**	**31**	**24**	**34**

VI. LEVEL OF DISAGGREGATION

This issue identifies what the appropriate levels of disaggregation are for purposes of the enforcement mechanism.

Arguments

BellSouth witness Coon testified that the appropriate level of disaggregation for compliance reporting is shown in Exhibit 16, DAC-4. Witness Coon argues that in the SEEM disaggregation, there is recognition that the products are different, but when BellSouth aggregated them to determine the penalty, they are grouped to make the statistical determination and to determine the appropriate penalty.

The ALEC Coalition proposes that disaggregation be required by interface type, preorder query type, product, volume category, work activity type, trouble type, trunk design and type (for trunk blockage measurements), maintenance and repair query type and collocation category to allow for like to like comparisons.

Witness Bursh argues that disaggregation is critical to an effective remedy plan because it prevents poor performance in one area from being obscured by being lumped together with dissimilar performance data. The ALECs specify that in the SEEM remedy plan, BellSouth aggregates all UNE loops together even though the processes (i.e. interval) for various loops, such as ADSL or analogs loops, may differ. For example, the interval for one DS1 Loop is 23 days and the interval for one two wire Analog Loops is four days. Witness Bursh testified that this is a critical failing of SEEM.

Specifically, the ALECs' concern is that, while there are 20 levels of disaggregation for Order Completion Interval measure in the BellSouth SQM, there are only eight levels of disaggregation for the same measure in SEEM. Similarly Reject Interval has 17 level of product disaggregation in the BellSouth SQM, however in the SEEM remedy plan, BellSouth is proposing one level of disaggregation.

The ALECs argue that BellSouth proposes to rely upon overly-aggregated results. Such aggregation masks differences and makes

detection on interior performance less likely. As discussed earlier, insufficient product disaggregation will allow BellSouth to mask discrimination and, thereby, influence the type and pace of developing competition. Witness Bursh states that in the SEEM remedy plan, discrimination of high-revenue or volume products, such as DS1s or DS3s, can easily be concealed given that they are consolidated with a dissimilar high volume product such as analog loops.

Achieving an appropriate level of disaggregation is important because measurements and reporting frequently occur only at this level. However, it is also important that the disaggregation not be so granular and so detailed so as to completely obfuscate performance. Using one analogy, one would not view an artist's painting by focusing only on the individual brush strokes. Yet the ALECs' proposal does just that by taking the comparison point at which BellSouth's performance is evaluated to extremes. According to witness Coon, the ALECs' plan includes approximately 75,000 submeasures, compared to approximately 1200 submeasures in BellSouth's plan. The level of disaggregation in the two plans principally accounts for this difference.

DECISION

Disaggregation is the process of breaking down performance data into sufficiently specific categories or dimensions so that like-to-like comparisons can be made. In order to compare BellSouth's performance for its own retail customers to its performance for ALECs', it is necessary for a UNE analog loop product to be compared to an analog at BellSouth that is equivalent. Disaggregation is important to an effective remedy plan because it prevents poor performance in one area from being combined with dissimilar performance data. For example comparing provisioning work that is dispatched for BellSouth to provision work that is not dispatched for ALECs may mask discriminatory performance, as would comparing mechanized processes for the ALECs to a manual process for BellSouth.

BellSouth has proposed disaggregation at a more granular level for reporting and pass/failure determination purposes than for penalty assessment. For reporting purposes, BellSouth proposes approximately 19 levels of product disaggregation.

However, the BellSouth SEEM methodology for determining penalties re-aggregates various product categories. BellSouth is proposing only seven levels of product disaggregation for penalty determination. We find that this product reaggregation is inappropriate for penalty determination. There are eight metrics included in this Order to which product disaggregation is applicable. We find BellSouth product disaggregation for compliance purposes shall match what it has recommended, and we have approved, for product reporting purposes.

In addition to the changes to product disaggregation, we find that for two BellSouth-proposed measures the company only pay penalties in the "fully mechanized" category of disaggregation. We find that the penalties for these two metrics, O-8 Reject Interval and O-11 FOC and Reject Response Completeness not be limited to fully mechanized. Penalties shall be paid for failures in partially mechanized and non-mechanized categories as well.

BellSouth's proposed disaggregation for penalty determination purposes is that specified in Attachment 7. This attachment which is incorporated in this Order, also contains our approved level of disaggregation. We estimate there would be over 825 levels of disaggregation for compliance reporting and penalties for Tier 1 and over 875 total levels of disaggregation for compliance reporting and penalties for Tier 2. Herein, we approve more detailed reporting of product and mechanization disaggregation than that proposed by BellSouth. We also approve product disaggregation. This order includes disaggregation by interface, system, volume, time interval, dispatch status and mechanization for metrics where appropriate.

ATTACHMENT 7

Enforcement Measures Disaggregation and Standards					
		BellSouth Proposed		Commission Approved	
No.	Measure	Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		Preordering			
OSS-1	Average Response Time and Response Interval	Region	Percent Response Received within 6.3 seconds: > 95%	Interface System Region	Parity + 2 seconds
OSS-2	Interface Availability (Pre-Ordering)	Region	≥ 99.5%	Region	≥ 99.5%
OSS-3	Interface Availability (Maintenance & Repair)	Region	≥ 99.5%	Region	≥ 99.5%
OSS-4	Response Interval (Maintenance and Repair)	Region	Parity	Region	Parity
PO-1	Loop Make Up – Average Response Time – Manual	Loops	95% in 3 Business Days	Loops	95% in 3 Business Days
PO-2	Loop Make Up – Average Response Time – Electronic	Loops	90% in 5 Minutes	Loops	95% in 1 Minutes
		Ordering			
O-1	Acknowledgment Message Timeliness	EDI TAG	90% w/i 30 Mins (6 mos – 95% within 30 Minutes) 95% within 30 Minutes	EDI TAG	95% ≤ 30 Minutes
O-2	Acknowledgment Message Completeness	EDI TAG	100%	EDI TAG	100%
O-3	Percent Flow-through Service Requests (Summary)	 Residence Business UNE LNP	 95% 90% 85% 85%	Total & Achieved Residence Business UNE LNP	 95% 90% 85% 85%
O-8	Reject Interval	Fully Mechanized	97% within 1 Hour	Fully Mechanized Partially Mechanized Non-Mechanized Local Interconnection Trunks	97% ≤ 1 Hour 95% ≤ 10 Hours 95% ≤ 24 Hours 95% ≤ 36 Hours
O-9	Firm Order Confirmation Timeliness	Mechanized Partially Mechanized Non-Mechanized Local Interconnection Trunks	95% ≤ 3 Hour 85% w/i 18 Hrs (in 3 mos) 85% w/i 10 Hrs (in 6 mos) 85% < 36 Hours 95% within 10 days	Fully Mechanized Partially Mechanized Non-Mechanized Local Interconnection Trunks	95% ≤ 3 Hours 95% ≤ 10 Hours 95% ≤ 24 Hours 95% ≤ 48 Hours
O-11	FOC and Reject Response Completeness	Fully Mechanized	95% Returned	Fully Mechanized Partially Mechanized Non Mechanized Local Interconnection Trunks	95% Returned
O-12	Speed of Answer in Ordering Center	CLEC-Local Carrier Service Center BellSouth -Business Service Center -Residence Service Center	Diagnostic	CLEC-Local Carrier Service Center BellSouth -Business Service Center -Residence Service Center	Parity with Retail
O-14	LNP-Reject Interval Distribution & Average Reject Interval	Not Proposed	Not Proposed	LNP UNE Loop with LNP	Fully Mechanized: 97% ≤ 1 Hour Partially Mechanized: 95% ≤ 10 Hours Non-Mechanized: 95% ≤ 24 Hours

Enforcement Measures Disaggregation and Standards					
		BellSouth Proposed		Commission Approved	
No.	Measure	Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmarks
O-15	LNP-Firm Order Confirmation	Not Proposed	Not Proposed	LNP UNE Loop with LNP	Fully Mechanized: 95% ≤ 3 Hours Partially Mechanized: 95% ≤ 10 Hours Non-Mechanized: 95% ≤ 24 Hours
			Provisioning		
P-3	Percent Missed Installation Appointments	Resale POTS Resale Design UNE Loop & Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design EELs	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop< DS1 Retail Digital Loop≥DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail TBD Retail Res and Bus Retail Design TBD

Enforcement Measures Disaggregation and Standards					
		BellSouth Proposed		Commission Approved	
No.	Measure	Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
P-4	Average Completion Interval (OCI) & Order Completion Interval Distribution	Resale POTS Resale Design UNE Loop & Port Combos UNE Loops UNE xDSL UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch 7 Days w/o Conditioning 14 Days w Conditioning ADSL Provided to Retail Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design EELs	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop< DS1 Retail Digital Loop≥DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp. 5 Days w/o Conditioning 12 Days w/Conditioning Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail TBD Retail Res and Bus Retail Design TBD
P-6	Coordinated Customer Conversions Interval	Unbundled Loops	95% ≤ 15 Minutes	Unbundled Loops	95% ≤ 15 Minutes
P-6A	Coordinated Customer Conversions Hot Cut Timeliness % within Interval and Average Interval	UNE Loops SL1 IDLC SL2 IDLC	95% + or – 15 minutes of Scheduled Start Time 95% w/in 4 Hour window 95% w/in 4 Hour window	SL1 Time Specific SL1 Non Time Specific SL2 Time Specific SL2 Non Time Specific SL1 IDLC	95% + or – 15 minutes of Scheduled Start Time 95% w/in 4 Hour window 95% w/in 4 Hour window

Enforcement Measures: Disaggregation and Standards					
		BellSouth Proposed		Commission Approved	
No.	Measure	Disaggregation	Analog/Benchmark	Disaggregation SL2 IDLC	Analog/Benchmark

Enforcement Measures Disaggregation and Standards					
		BellSouth Proposed		Commission Approved	
No.	Measure	Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
P-6C	Coordinated Customer Conversions – % Provisioning Troubles Received W/in 7 days of a completed Service Order	UNE Loops	≤ 5%	UNE Loops Design UNE Loops Non-Design Dispatch/Non-Dispatch	≤ 5%
P-7	Cooperative Acceptance Testing - % of xDSL Loops Tested	UNE xDSL	95% of Lines Tested	UNE xDSL -ADSL -HDSL -UCL -Other	95% of Lines Successfully Tested
P-8	% Provisioning Troubles w/in 30 days of Service Order Completion	Resale POTS Resale Design UNE Loop & Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design EELs	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res& Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop< DS1 Retail Digital Loop≥DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail TBD Retail Res and Bus Retail Design TBD
P-10	LNP – Percent Missed Installation Appointments	LNP	95% of Due Dates Met	LNP	95% of Due Dates Met

Enforcement Measures Disaggregation and Standards					
		BellSouth Proposed		Commission Approved	
No.	Measure	Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		Maintenance and Repair			
M&R-1	Missed Repair Appointments	Resale POTS Resale Design UNE Loop & Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res& Bus Dispatch Retail Res & Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
M&R-2	Customer Trouble Report Rate	Resale POTS Resale Design UNE Loop & Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res& Bus Dispatch Retail Res & Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail

Enforcement Measures Disaggregation and Standards					
		BellSouth Proposed		Commission Approved	
No.	Measure	Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
M&R-3	Maintenance Average Duration	Resale POTS Resale Design UNE Loop & Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res& Bus Dispatch Retail Res & Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
M&R-4	Percent Repeat Troubles w/i 30 days	Resale POTS Resale Design UNE Loop & Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res & Bus Dispatch Retail Res & Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail

Enforcement Measures Disaggregation and Standards					
		BellSouth Proposed		Commission Approved	
No.	Measure	Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
M&R 5	Out of Service > 24 Hours	Not Proposed	Not Proposed	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res & Bus Dispatch Retail Res & Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
Billing					
B-1	Invoice Accuracy	CLEC State BellSouth State	Parity with Retail	CLEC State BellSouth State	Parity with Retail
B-2	Mean Time to Deliver Invoices	CLEC State - CRIS - CABS BellSouth State	Parity with Retail	CLEC State - CRIS - CABS BellSouth State	Parity with Retail
B-3	Usage Data Delivery Accuracy	CLEC State BellSouth State	Parity with Retail	CLEC State BellSouth State	Parity with Retail
Trunk Group Performance					
TGP-1	Trunk Group Performance-Aggregate	CLEC aggregate BellSouth aggregate	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth	CLEC aggregate BellSouth aggregate	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth
TGP-2	Trunk Group Performance-CLEC Specific	CLEC Trunk Group BellSouth Trunk Group	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for	CLEC Trunk Group BellSouth Trunk Group	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16

Enforcement Measures Disaggregation and Standards					
		BellSouth Proposed		Commission Approved	
No.	Measure	Disaggregation	Analog/Benchmark BellSouth	Disaggregation	Analog/Benchmark for CLECs and 9 for BellSouth
Collocation					
C-3	Percent of Due Dates Missed	All Collocation Arrangements	≥ 90% on Time	All Collocation Arrangements	≥ 95% on Time
Change Management					
CM-1	Timeliness of Change Management Notices	Region	95% ≥ 30 days of Release	Region	98% On Time
CM-3	Timeliness of Documents Associated with Change	Region	95% ≥ 30 days of the change	Region	98% On Time

VII. PERFORMANCE DATA AND REPORTS AVAILABLE TO ALECs

In this Section, we address what performance data and reports need to be made accessible by BellSouth to the ALECs. BellSouth asserts that it should provide the SQM results and raw data that supports the PMAP results. The ALECs suggest providing additional information, such as information on BellSouth's affiliates' results, services and facilities provided to carriers, as well as a manual to interpret raw data and a single point of contact available to answer the ALECs' questions.

Arguments

BellSouth witness Coon states that the appropriate performance data and reports to be made available to the ALECs are identified in the BellSouth SQM. The BellSouth SQM specifically identifies a "Report Structure" section which indicates key dimensions of each report for each measure.

In its brief, BellSouth states that:

> [T]here is no compelling reason to provide raw data for every one of the measures and that to do so is simply not possible. As to the former point, the raw data that is derived from PMAP (which is available on BellSouth's Web site) will, as Mr. Coon testified, "include the most critical ordering, provisioning, and maintenance and repair measurements in which ALECs generally are interested, including, but not limited to, FOC Timeliness, Reject Interval, Percent Missed Installation Appointments, Average Completion Interval, Order Completion Interval Distribution, Missed Repair Appointments, Customer Trouble Report Rate and Maintenance Averaged [sic] Duration." Thus, BellSouth is willing and able to produce the raw data that underlies the most important reports.

BellSouth states that it does not have the capability to make available electronically the raw data that is used to generate performance reports outside of PMAP, such as raw data for regional reports that are not (and cannot) be separated by the ALEC (e.g., Speed of Answer in the Maintenance Center). These measurements reflect the time that a call, in effect, waits

in line before it is answered by a BellSouth representative. The work centers that receive the calls are regional, and hundreds of thousands of calls are received each month from throughout the entire region. As Mr. Coon states, "although each call is individually timed and the averages for the month are posted in the SQM reports, it is not possible to electronically identify each and every ALEC call underlying these SQM reports."

The ALEC Coalition stated:

> BellSouth should provide ALECs with performance data and reports that include BellSouth's provision of:
>
> 1. Services to BellSouth's retail customers in aggregate;
> 2. Services and facilities provided to any BellSouth local exchange affiliate purchasing interconnection, unbundled network elements or resale;
> 3. Services and facilities provided to carriers purchasing interconnection, unbundled network elements or resale in the aggregate; and
> 4. Services and facilities provided to individual carriers purchasing interconnection, unbundled network elements or resale.

According to the ALEC Coalition the reports should reflect the outcome of statistical procedures applied to each submeasure for which a parity determination will be made. Benchmark results should also be reported, according to the Coalition.

According to the ALECs, BellSouth is currently not providing access to the raw data underlying a number of measures such as the following:

Ordering

- LNP Percent Rejected Interval Service Requests Totally Mechanized
- LNP Percent Rejected Interval Service Requests Partially Mechanized
- LNP Percent Rejected Interval Service Requests Fully Mechanized

- LNP Reject Interval Service Requests Totally Mechanized
- LNP Reject Interval Service Requests Partially Mechanized
- LNP Reject Interval Service Requests Fully Mechanized
- LNP Firm Order Confirmation Totally Mechanized
- LNP Firm Order Confirmation Partially Mechanized
- LNP Firm Order Confirmation Fully Mechanized

Provisioning

- LNP Total Order Cycle Time Mechanized
- LNP Total Order Cycle Time Mechanized with Appointment Codes
- LNP Percent Missed Installation Appointments
- LNP Disconnects

Billing

- Invoice accuracy CLEC (Region)
- Mean Time to Deliver Invoices CLEC (Region)
- Usage Data Delivery Accuracy CLEC
- Usage Timeliness & Completeness CLEC

For many facilities-based ALECs, LNP orders are a critical aspect of their business. By not providing access to LNP raw data, BellSouth prohibits ALECs from validating its reported performance. According to the ALEC Brief, an effective remedy plan should provide performance reports and the supporting raw data for all measures in the plan. BellSouth's SEEM does not.

DECISION

We find that BellSouth shall make performance data and reports available to individual ALECs and to this Commission on its Interconnection Services Web site. ALECs need access to this information in order to ascertain problems they may be causing themselves or performance problems they may be experiencing from BellSouth. We need this information to ascertain whether, from an aggregate standpoint, BellSouth is providing service at parity to ALECs in the state of Florida. Each report shall contain the information specified in the BellSouth SQM "Report Structure"

section. We also agree that BellSouth shall provide electronic access to the Performance Monitoring and Analysis Platform raw data underlying the performance measures. Additionally, we find that BellSouth shall provide detailed instructions regarding access to the reports and to the raw data, as well as the nature of the format of the data provided on the Web site to provide guidance to CLECs.

We are concerned with the fact that raw data is not available for the LNP and Billing measures. We agree with the ALECs that the lack of this information prevents ALECs from validating reported performance. We understand and acknowledge that BellSouth does not currently have the capability for providing access to the raw data for these measures. The record is silent on why some measures are included in PMAP while others are not. We encourage BellSouth to consider incorporating these measures into PMAP if at all possible. Additionally, this issue can be revisited during the six-month review period to determine if additional changes should be made.

VIII. LOCATION, TIMING, AND FORMAT OF PERFORMANCE DATA AND REPORTS

Here, we address the specific requirements of reporting performance data and reports to the ALECs. The term "requirements" is further defined as the location, timing, and format in which the information is made available.

Arguments

BellSouth states that all parties agree that it is appropriate for the reports to be published electronically on the BellSouth Website. According to BellSouth, the disputed aspect of this issue concerns the time frame for providing this information. BellSouth has committed to posting the reports by the 30th day after the month in which the reported activity takes place.

Witness Coon strongly objects to posting by the 20th day of the following month for these reports. He believes that, with the large number of ALECs in Florida, there would be such a large number of reports to be generated that BellSouth would not be able to meet the proposed deadlines. Witness Coon states that

the 30th of the month is far more reasonable. Witness Coon states there are approximately 155 ALECs operating in Florida. Further, there are 105 ALEC-specific reports included in the BellSouth SQMs and 129 reports that reflect BellSouth/ALEC aggregate reports. Thus, to determine the maximum amount of reporting that might be due in any month would require multiplying the 155 ALECs times 105 reports (16,275 reports) and adding the 129 aggregate reports, which would total 16,404 reports. Further, raw data would have to be produced for many of the reports, as described previously. According to the BellSouth brief, given the magnitude of the reporting that must be done by BellSouth, combined with the fact that BellSouth makes every effort to validate the data before it is reported, BellSouth submits that posting a report by the 30th day of the month is the most reasonable of the proposals that have been made.

Witness Bursh agrees with BellSouth witness Coon that the performance data and reports should be available to the ALECs on an internet Website. Witness Bursh also states that the performance data should be provided in a format that can readily be utilized by standard database management tools such as Excel, Access, or Oracle.

DECISION

As to the format of the reports, the parties appear to agree that it is appropriate for the reports to be published electronically on BellSouth's Interconnection Services Website in a format that can readily be utilized by standard database management tools such as Excel, Access, or Oracle. The disputed aspect of this issue concerns the time frame for providing this information.

We agree with BellSouth that the reports shall be posted as soon as possible after the month ends but no later than by the 30th day of the month after the activity is incurred. We agree with BellSouth that generating and posting the number of reports required per the BellSouth proposal (1,404 reports plus raw data) will be time consuming and may require until the 30th of the month following the activity.

> will not be penalized if a measurement captures a single failed event.

According to BellSouth, its plan is patterned after the plans utilized in Texas and New York in that penalties are assigned only to certain key measures. BellSouth maintains that the Louisiana and Georgia plans do the same. In each instance, the selection of key measures has entailed winnowing out those measurements that are less critical and that, therefore, should not have associated penalties.

On behalf of the ALECs, witness Bursh claims to apply the same standard. According to BellSouth, "if this is indeed true, then the ALECs' method of applying this standard is novel, to say the least. As Ms. Bursh testified, 'in the ALEC plan, because the submeasures monitor key areas of ALEC and BellSouth activity, all submeasures proposed by the ALECs are included in the determination of remedy payments.' In other words, all 100,000 plus submeasures in the ALEC plan are simply assumed to be important enough to justify a penalty."

The ALECs do not believe that the BellSouth-proposed enforcement measures encompass a comprehensive range of carrier-to-carrier performance. The ALECs' position is that all submeasures proposed by the ALEC Coalition should be included in both Tier 1 and Tier 2 of the enforcement plan. Witness Bursh testified that the ALECs' plan measures "cover the full panoply of BellSouth's activities that ALECs must rely upon in order to deliver retail service offerings in the local market place." The ALECs believe that "every submeasure is designed to identify and measure a key area of activity that affects ALEC and BellSouth customers, and consequently, the development of competition in Florida's local telecommunications markets." In the ALEC plan, because the submeasures monitor "key areas" of performance, all submeasures proposed by the ALECs are included in the determination of remedy payments.

In addition, the ALEC witnesses distinguished the FCC New York BellAtlantic Order that appears to support BellSouth's position that an enforcement plan should not include all measures. In its BellAtlantic Order, the FCC stated that the measures the New York Commission selected for inclusion in its remedy plan were sufficient. The ALECs' position is that the FCC

did not exclude the possibility that, in a different circumstance, an appropriate enforcement plan should include all measures.

Witness Bursh testified that the measures in BellSouth's SEEM remedy plan and BellSouth SQM were unilaterally selected by BellSouth without any direct input from the ALEC community. Moreover, witness Kinard alleges that BellSouth has unilaterally made its determination of the measures that are "key" ALEC customer-impacting measures. Witness Bursh argues that, while BellSouth has been ordered to include certain measures requested by ALECs in its SQM, BellSouth has not requested, and has even ignored, input from the ALECs regarding the measures that should be included in its SQM and SEEM remedy plans. The ALEC Coalition stated that the measures in BellSouth's SEEM remedy plan do not encompass a comprehensive range of carrier-to-carrier performance.

Specifically, the ALECs argue that BellSouth's SEEM remedy plan is far more narrow than its SQM plan. According to witness Kinard, the SEEM remedy plan contains only a small subset of the measures BellSouth proposes to report on for this Commission. As an example, witness Coon acknowledges that FOC Timeliness is a key measure for ALECs. Nevertheless, the ALECs claim BellSouth excluded FOC Timeliness from Tier 1 of SEEM.

Additionally, the ALECs argue that SEEM does not specify LNP-FOC Timeliness or LNP Reject Interval as enforcement measures. According to witness Bursh, for many facilities-based ALECs, LNP orders are critical aspect of their business. Without a FOC, ALECs cannot provide customers with an expected date of service. According to witness Bursh, BellSouth can hinder an individual ALEC's ability to provide its customers with timely notice of service without a consequence to BellSouth.

The ALEC coalition points out that many other measures are omitted from the BellSouth remedy plan. According to witness Bursh, BellSouth has inappropriately excluded the following metrics from Tier 1 consequences:

1. Invoice Accuracy
2. Mean Time to Deliver Invoices
3. Usage Data Delivery Accuracy